IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

| RACHEL REYNOLDS, on behalf of herself and all others similarly situated, Plaintiff, |) Case No. 1:19-cv-00735-MRB) Judge Hon. Michael R. Barrett) |
|--|--|
| VS. |) |
| A & L HOME CARE AND TRAINING CENTER, LLC, et al., |))) |
| Defendants | <i>'</i> |

<u>DEFENDANTS' MOTION FOR ADDITIONAL TIME TO RESPOND TO COMPLAINT</u> <u>TO ENABLE CONTINUED SETTLEMENT DISCUSSIONS</u>

Defendants hereby move this Court for an additional extension of time, until November 22, 2019, within which to respond to the Complaint.

Defendants have previously moved the court for an extension of time and recognize that a request for another is unusual. However, the parties have been discussing informal resolution. To facilitate those discussions, defendants have voluntarily produced payroll documents and other records. They made a proposal to resolve this case on or about October 23 and, after further discussions with plaintiff's counsel, made a revised proposal on November 6. The proposal, if accepted, would resolve this case.

The parties are engaged in meaningful discussions and seek this time to speed, rather than to delay, this litigation. Even if the discussions do not ultimately resolve the case, these discussions have assisted the parties on focusing on the issues in dispute and will enhance the case's handling in any case.

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The parties discussed this extension at the time defendants made their latest proposal and plaintiff's counsel agreed it was appropriate.

For these reasons, defendants respectfully request an extension of time until November 22, 2019 to enable the parties to continue their informal efforts to reach an amicable resolution to this case.

Dated: November 8, 2019

Respectfully submitted,

/s/ M. Scott McIntyre

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Attorneys for A & L Home Care and Training Center, LLC, et al.

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of November 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notice of electronic filing to the following:

Shannon Marie Draher (074304) Hans A. Nilges (076017) Nilges Draher LLC 7266 Portage Street, N.W., Suite D Massillon, OH 44646 Counsel for Plaintiff

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